

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION  
INITIATIVE, 2011

DOCKET NO. N2011-1

DAVID B. POPKIN MOTION

July 28, 2011

Respectfully submitted,

N20111MOTION

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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On July 27, 2011, the United States Postal Service filed a Notice of filing Library References with application for Non-Public Status [Notice].

NOTICE OF UNITED STATES POSTAL SERVICE  
OF FILING OF INITIAL LIBRARY REFERENCES  
AND APPLICATION FOR NON-PUBLIC TREATMENT OF MATERIAL  
(July 27, 2011)

Two of the five Library References are being filed as Nonpublic Material – USPS-LR-N2011-1/NP1 and USPS-LR-N2011-1/NP2.

Library Reference USPS-LR-N2011-1/NP 1 is entitled “Nonpublic Material Related to Postal Locations “Nearest Neighbor” Calculation and Results.

The five pages of the Notice appear to only reference the request for non-public treatment of Library Reference USPS-LR-N2011-1/NP2 and appear to make no reference to Library Reference USPS-LR-N2011-1/NP1.

By not providing an explanation of what Nearest Neighbor Calculations show or why they should be nonpublic, I am not able to evaluate the Postal Service’s request nor can I believe that the Commission can.

With respect to the request for nonpublic treatment of Library Reference USPS=LR-N2011-1/NP2, the Postal Service should be required to provide the revenue bracket that each of the facilities lie in, namely,

Less than \$27,500 [\$10,000 in Alaska]

Between \$27,500 and \$600,000

Between \$600,000 and \$1,000,000

Over \$1,000,000

By providing the revenue bracket, participants will be able to evaluate the accuracy of the listing of facilities subject to evaluation.